

EXHIBIT A

Deposition of Ugochukwu Nwauzor
6/19/2018

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THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

CHAO CHEN, individually and)	
on behalf of all those)	No. 3:17-cv-05769-RJB
similarly situated,)	
)	
Plaintiff,)	
)	
v.)	
)	
THE GEO GROUP, INC., a)	
Florida corporation,)	
)	
Defendant.)	

VIDEO-RECORDED DEPOSITION UPON ORAL EXAMINATION OF
NWAUZOR UGOCHUKWU
June 19, 2018
Fircrest, Washington

Taken Before:

Laura A. Gjuka, CCR #2057
Certified Shorthand Reporter

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1 Q Some medication?

2 A Some medication. And that was -- I was -- I forgot that
3 pod, before I was transferred to G-2.

4 Q Okay. So that --

5 A That was my first pod when I got there in detention.

6 And then there we have a kind of general restroom.

7 There in G-2 -- there in G-2, in my room, we have the
8 toilet, we have everything there. You can pee there.

9 But in the former pod it's general. It's not in the

10 room. Everybody is -- you know, the bed is outside the

11 hall. Then we are in G-2, I have -- everybody have room

12 inside. The only thing we come around to do is take a

13 shower outside. But you can have your everything in

14 your room.

15 There something happened when I was taking the pill.

16 The doctor tell me I will be frequently going to, you

17 know, pee a lot of water. When I taking that drug, you

18 know, I see kind of change in my body. Like going to

19 pee, the doctor also told me you will experience much

20 urination, you know.

21 Some -- when I went to the general -- you know, the

22 general toilet, somebody was already there. I don't

23 know what I can do, like -- you know, I have to say, I

24 hold my this thing. I don't know what to do. I was

25 like, What is going on? Please, Bro. And the guy over

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1 there is not an English-speaking guy. He doesn't
2 understand me. And myself, I don't understand him. He
3 starting shouting.

4 I'm like my bladder like coming out my -- you know,
5 I left that restroom, walked down to another restroom.
6 I met one Africa guy, that guy is from Africa, he going,
7 Please, please, please, please. Then just. The first
8 guy went to the -- went to the --

9 MS. MELL: Security.

10 THE WITNESS: -- security in charge of the
11 pod. The security called me. I explained everything to
12 the security, brought all my pills to the security.
13 Look at what I'm going through. I don't have a private
14 room. If I have private room I can pee there whenever I
15 want to pee. But the condition I find myself. I can't
16 pee outside there. When I got go to the room, I saw
17 this guy, and this guy couldn't help me. I don't know
18 what he -- you know, what he thought I'm going to do to
19 him.

20 I'm like -- I was crying. Most of the people there
21 understand, you know, the condition I find myself. The
22 guard said, You're going to remove me from this pod,
23 reported me to the highest security. They called me. I
24 explained everything to them. Look at what's happened.
25 They told me they going to check the camera. They going

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1 to view to know what I said was true.

2 I've said, Since I'm born, I'm a child of God. And
3 when I say something, that is how it be. I don't lie.
4 I tell you about me. That's okay. They going to
5 investigate. After the chief security officer, they
6 investigate it -- they took me to a cell. They took me
7 to a cell from morning to evening. They took me to a
8 cell.

9 I was crying in the cell. Said, what did I do? You
10 know, ask my fellow young guy to help me, let me pee.
11 That's the only problem, you know, bad I did. That's
12 what happened.

13 BY MR. DEACON:

14 Q Okay. So another detainee reported you to the guard --

15 A Yeah.

16 Q -- because of that incident?

17 A That incident.

18 Q Okay. My question to you, though, is: Did you get
19 medical attention for having a problem urinating?

20 A That's what -- yeah.

21 Q Okay.

22 A Yeah.

23 Q Okay. Was that when you first got to the Northwest
24 Detention Center? Was it early on when you were at
25 Northwest Detention Center?

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1 C E R T I F I C A T E

2 I, Laura Gjuka, a Certified Court Reporter in
3 and for the State of Washington, residing at
4 University Place, Washington, authorized to administer
5 oaths and affirmations pursuant to RCW 5.28.010, do
6 hereby certify;

7 That the foregoing Verbatim Report of Proceedings
8 was taken stenographically before me and transcribed
9 under my direction; that the transcript is a full, true
10 and complete transcript of the proceedings, including
11 all questions, objections, motions and exceptions;

12 That I am not a relative, employee, attorney or
13 counsel of any party to this action or relative or
14 employee of any such attorney or counsel, and that I am
15 not financially interested in the said action or the
16 outcome thereof;

17 That upon completion of signature, if required, the
18 original transcript will be securely sealed and the same
19 served upon the appropriate party.

20 IN WITNESS HEREOF, I have hereunto set my hand this
21 25th day of June, 2018.

22

23

24

25

Laura Gjuka, CCR No. 2057